

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LINDA L. MACK (a/k/a LYNNE L. MACK)	)	
	)	
Plaintiff	)	
	)	
v.	)	No. 08 C 3127
	)	
BARRY S. MARAM, in his official capacity	)	Judge Kennelly
as Director of the Illinois Department of	)	Magistrate Judge Cox
Healthcare and Family Services, and	)	
CAROL L. ADAMS, in her official capacity	)	
as Secretary of the Illinois Department of	)	
Human Services,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION**

TO: John E. Huston Christopher S. Gange Assistant Attorneys General 160 N. LaSalle Street, Suite N-1000 Chicago, Illinois 60601	James A. Lang Assistant Attorney General 100 W. Randolph St., 13 <sup>th</sup> Floor Chicago, Illinois 60601
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PLEASE TAKE NOTICE THAT on August 29, 2008, at 9:00 a.m. the undersigned shall appear before the Honorable Matthew F. Kennelly, United States District Court Judge, in Room 2188 or such other Room or Courtroom as the court sees fit, of the Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois 60604, and present Plaintiff's Motion For Leave of Court To Amend Her Verified Complaint and File Her First Amended Complaint. A true and correct copy of the Plaintiff's Motion For Leave of Court To Amend Her Verified Complaint and File Her First Amended Complaint, filed electronically with the Clerk of the United District Court for the Northern District of Illinois, is hereby served upon you.

STEVEN C. PERLIS  
HELEN MESOLORAS  
ELDER LAW OFFICE OF STEVEN C. PERLIS  
& ASSOCIATES, P.C.  
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LINDA L. MACK  
(a/k/a LYNNE L. MACK)  
  
By: /s/ Steven C. Perlis  
Attorney for Plaintiff

Dated: August 25, 2008

**CERTIFICATE OF SERVICE**

I, Steven C. Perlis, an attorney of record for Plaintiff, Linda L. Mack (a/k/a Lynne L. Mack), do hereby certify that on August 25, 2008, true and correct copies of the foregoing (1) PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND HER VERIFIED COMPLAINT AND FILE HER FIRST AMENDED COMPLAINT, and (2) NOTICE OF MOTION, were served upon the following counsel of record for Defendants through the District Court's Electronic Case Filing system:

John E. Huston  
Christopher S. Gange  
Assistant Attorneys General  
160 N. LaSalle Street, Suite N-1000  
Chicago, Illinois 60601

James A. Lang  
Assistant Attorney General  
100 W. Randolph St., 13<sup>th</sup> Floor  
Chicago, IL 60601

/s/ Steven C. Perlis  
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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LINDA L. MACK (a/k/a LYNNE L. MACK)	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 C 3127
	)	
BARRY S. MARAM, in his official capacity as Director of the Illinois Department of Healthcare and Family Services; and	)	Judge Kennelly
	)	Magistrate Judge Cox
CAROL L. ADAMS, in her official capacity as Secretary of the Illinois Department of Human Services,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND HER VERIFIED  
COMPLAINT AND FILE HER FIRST AMENDED COMPLAINT**

NOW COMES Plaintiff, LINDA L. MACK (a/k/a LYNNE L. MACK), by and through her attorneys, STEVEN C. PERLIS and HELEN MESOLORAS, attorneys with the ELDER LAW OFFICE OF STEVEN C. PERLIS & ASSOCIATES, P.C., and pursuant to Rule 15(a) and specifically Rule 15(a)(2) of the Federal Rules of Civil Procedure, hereby requests that this Honorable Court give Plaintiff leave to amend her Verified Complaint received May 30, 2008, and file her First Amended Complaint. This amended pleading seeks to narrow the issues and may streamline these proceedings.

STEVEN C. PERLIS  
HELEN MESOLORAS  
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Respectfully submitted,

LINDA L. MACK  
(a/k/a LYNNE L. MACK), Plaintiff

By: /s/ Steven C. Perlis  
Attorney for Plaintiff

Dated: August 25, 2008

**CERTIFICATE OF SERVICE**

STEVEN C. PERLIS, one of the attorneys of record for Plaintiff Linda L. Mack (a/k/a Lynne L. Mack), hereby certifies that he caused a copy of the foregoing **PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND HER VERIFIED COMPLAINT AND FILE HER FIRST AMENDED COMPLAINT** to be served by the Court's ECF/electronic mailing system upon the following:

John E. Huston  
Christopher S. Gange  
Assistant Attorneys General  
160 N. LaSalle Street, Suite N-1000  
Chicago, Illinois 60601

James A. Lang  
Assistant Attorney General  
100 W. Randolph St., 13<sup>th</sup> Fl.  
Chicago, IL 60601

/s/ Steven C. Perlis